

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON)
(GBD)) Civil Action No. 03 MDL 1570
SEPTEMBER 11, 2001)
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)

This document relates to: All Actions

**DECLARATION OF MARTIN F. MCMAHON IN SUPPORT OF MOTION TO
WITHDRAW MARTIN F. MCMAHON & ASSOCIATES AS COUNSEL OF
RECORD FOR DEFENDANT SANABEL AL KHEER, INC.**

1. I am a member of the law firm, Martin McMahon & Associates, attorneys for Defendant Sanabel Al Kheer, Inc.
2. I am familiar with the proceedings in this case and my law firm has represented Defendant Sanabel Al Kheer, Inc. since the inception of this action. I state the following in support of my firm's motion to withdraw as counsel of record for Sanabel Al Kheer, Inc.
3. On November 19, 2009, my firm received a letter dated November 17, 2009 from the Board of Directors for Sanabel Al Kheer, Inc. stating that our representation of Defendant Sanabel Al Kheer was to terminate as of November 20, 2009.
4. Due to the upcoming hearing, my firm contacted the Board of Directors for Sanabel Al Kheer on November 20, 2009 and November 23, 2009 to confirm that the organization was aware of the hearing and wished to terminate my firm's services in advance of the hearing. On November 24, 2009, I received confirmation that Sanabel Al Kheer, Inc. did intend to terminate my firm's services in advance of the hearing.

5. Accordingly, my firm advised Defendant Sanabel Al Kheer, Inc. of the need to hire new counsel immediately to represent the organization at the upcoming hearing.

6. For the foregoing reasons, I respectfully request that this Court grant permission to me and my law firm to withdraw from representation of Sanabel Al Kheer, Inc. in the above captioned matter. A proposed order is attached.

7. I certify that all of the foregoing statements made by me are true, and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 24, 2009:



Martin F. McMahon, Esq.